



**Minnesota Pollution
Control Agency**

520 Lafayette Road North
St. Paul, MN 55155-4194

MS4 SWPPP Application for Reauthorization

**for the NPDES/SDS General Small Municipal Separate
Storm Sewer System (MS4) Permit MNR040000
reissued with an effective date of August 1, 2013**
Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at <http://www.pca.state.mn.us/ms4>.

Submittal: This *MS4 SWPPP Application for Reauthorization* form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: City of West Saint Paul *County: Dakota
(city, county, municipality, government agency or other entity)

*Mailing address: 1616 Humboldt Avenue

*City: West Saint Paul *State: MN *Zip code: 55118

*Phone (including area code): (651) 552-4102 *E-mail: shatfield@cityofwsp.org

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Saam *First name: Matt
(department head, MS4 coordinator, consultant, etc.)

*Title: City Engineer

*Mailing address: 1616 Humboldt Avenue

*City: West Saint Paul *State: MN *Zip code: 55118

*Phone (including area code): (651) 552-4130 *E-mail: msaam@cityofwsp.org

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: Knoff First name: Mark
(department head, MS4 coordinator, consultant, etc.)

Title: Consultant

Mailing address: Foth Infrastructure & Environment, LLC, Eagle Point II, 8550 Hudson Boulevard North, Suite 100

City: Lake Elmo State: MN Zip code: 55042

Phone (including area code): (651)288-8563 E-mail: mark.knoff@foth.com

Verification

- I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this *MS4 SWPPP Application for Reauthorization* form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
- I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

- ☒ Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Matt Fulton
(This document has been electronically signed)

Title: City Manager Date (mm/dd/yyyy): 12/02/2013

Mailing address: 1616 Humboldt Avenue

City: West Saint Paul State: MN Zip code: 55118

Phone (including area code): 651-552-4101 E-mail: MFulton@cityofwsp.org

Note: The application will not be
processed without certification.

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

- A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☐ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
Dakota County, mapping support	MCM 3

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships*.

There are no other formal partnerships for the purposes of meeting MCM or other permit requirements. The City plans to utilize strategic partnerships as they become available to enhance their storm water pollution prevention program. The City also has a partnership with Dakota County to assess the health of the wetlands in the community. This information can be used in the analysis of the effectiveness of our stormwater program, but is not a formal part of the program.

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☒ Yes ☐ No

1. If yes:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

West Saint Paul City Code Section 700.25, Storm Water Illicit Discharge and Illicit Connection

West Saint Paul City Code Section 120, Administrative Citations

Direct link:

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg*.

2. If no:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

The City, with the assistance of a consultant, will review and update our IDDE regulatory mechanism to meet the new requirements of the MS4 general permit. This effort will be completed within 12 months of the date permit

coverage is extended. For all ordinance updates, a draft will be completed within nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance.

Construction site stormwater runoff control

- A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If **yes**:

- a. Check which type of regulatory mechanism(s) your organization has (check all that apply):

☒ Ordinance ☐ Contract language
☒ Policy/Standards ☒ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

West Saint Paul Zoning Ordinance Section 40, STORMWATER MANAGEMENT, specifically:

West Saint Paul Zoning Ordinance Section 40.1, POLICY

West Saint Paul Zoning Ordinance Section 40.2 DEFINITIONS

West Saint Paul Zoning Ordinance Section 40.3(1) GENERAL POLICY ON STORMWATER RUNOFF RATES

West Saint Paul Zoning Ordinance Section 40.3(2) THE STORMWATER POLLUTION CONTROL PLAN AND GRADING PLAN

West Saint Paul Zoning Ordinance Section 40(3) INSPECTIONS OF THE STORMWATER POLLUTION CONTROL PLAN MEASURES

West Saint Paul Zoning Ordinance Section 40(4), MINIMUM REQUIREMENTS OF THE STORMWATER POLLUTION CONTROL PLAN

West Saint Paul Zoning Ordinance Section 40(5), GENERAL STORMWATER POLLUTION CONTROL PLAN CRITERIA

West Saint Paul Zoning Ordinance Section 40(6), MINIMUM STORMWATER POLLUTION CONTROL PLAN MEASURES AND RELATED INSPECTIONS

West Saint Paul Zoning Ordinance Section 40(10), MODELS/METHODOLOGIES/COMPUTATIONS

West Saint Paul Zoning Ordinance Section 40.4 REVIEW

West Saint Paul Zoning Ordinance Section 40.5 MODIFICATION OF PLAN

West Saint Paul Zoning Ordinance Section 40.6 FINANCIAL SECURITIES

West Saint Paul Zoning Ordinance Section 40.7 NOTIFICATION OF FAILURE OF THE STORMWATER POLLUTION CONTROL PLAN

West Saint Paul Zoning Ordinance Section 40.8 EXCEPTIONS

West Saint Paul Zoning Ordinance Section 40.9 ENFORCEMENT AND PENALTIES

West Saint Paul Zoning Ordinance Section 40.10 RIGHT OF ENTRY AND INSPECTION

West Saint Paul Zoning Ordinance Section 40.11 ABROGATION AND GREATER RESTRICTIONS

Direct link:

http://www.cityofwsp.org/vertical/Sites/%7B2CF6FEAE-EDC4-4E50-A078-817B219E41B8%7D/uploads/Letterhead_2012_Flow_chart_Planning.pdf

http://www.cityofwsp.org/vertical/Sites/%7B2CF6FEAE-EDC4-4E50-A078-817B219E41B8%7D/uploads/Letterhead_2012_Flow_chart_Building.pdf

http://www.cityofwsp.org/vertical/Sites/%7B2CF6FEAE-EDC4-4E50-A078-817B219E41B8%7D/uploads/Letterhead_2012_Commercial_building_permit_submittal_requirements.pdf

http://www.cityofwsp.org/vertical/Sites/%7B2CF6FEAE-EDC4-4E50-A078-817B219E41B8%7D/uploads/Combined_Building_Permit_2013-Building_Plumbing_Signs_12-19-12.pdf

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg*.

- B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐ Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

We will update our construction site stormwater runoff control regulatory mechanism to be at least as stringent as the MPCA NPDES Stormwater Construction Activity Permit. The City has hired a consultant to recommend language that will comply with the new MS4 permit. This effort will be completed within 12 months of the date permit coverage is extended. For all ordinance updates, a draft will be completed within nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance.

- C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

- | | |
|--|---|
| 1. Best Management Practices (BMPs) to minimize erosion. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. BMPs for dewatering activities. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 5. BMP maintenance | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 8. Criteria for the use of temporary sediment basins. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

All areas listed above, except C4 (Records) and C6 are addressed in West Saint Paul Zoning Ordinance Section 40.3(4)-(7) & (10). Areas C4 and C6 will be incorporated into a revised ordinance and areas C1-C3, C5 and C6-8 will amended to meet the new permit requirements. The City has hired a consultant to recommend language that will comply with the new MS4 permit. The ordinance amendment will be completed within 12 months of the date permit coverage is extended. Items C1 through C8 will be incorporated into a site plan checklist within 12 months of the date permit coverage is extended. For all ordinance updates, a draft will be completed within nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance.

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?

☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- | | |
|--|--|
| <input checked="" type="checkbox"/> Ordinance | <input type="checkbox"/> Contract language |
| <input type="checkbox"/> Policy/Standards | <input type="checkbox"/> Permits |
| <input type="checkbox"/> Rules | |
| <input type="checkbox"/> Other, explain: _____ | |

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

West Saint Paul Zoning Ordinance Section 40 STORMWATER MANAGEMENT, specifically

West Saint Paul Zoning Ordinance Section 40.2 DEFINITIONS

West Saint Paul Zoning Ordinance Section 40.3(1) GENERAL POLICY ON STORMWATER RUNOFF RATES

West Saint Paul Zoning Ordinance Section 40(5), GENERAL STORMWATER POLLUTION CONTROL PLAN

CRITERIA

West Saint Paul Zoning Ordinance Section 40(6)a, MINIMUM STORMWATER POLLUTION CONTROL PLAN MEASURES AND RELATED INSPECTIONS

West Saint Paul Zoning Ordinance 40.3(7) PERMANENT STORM WATER POLLUTION CONTROLS

West Saint Paul Zoning Ordinance 40.3(8) MINIMUM DESIGN STANDARDS FOR STORMWATER WET DETENTION FACILITIES

West Saint Paul Zoning Ordinance Section 40.3(9) MINIMUM PROTECTION FOR NATURAL WETLANDS

West Saint Paul Zoning Ordinance Section 40(10), MODELS/METHODOLOGIES/COMPUTATIONS

Direct link:

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: MS4NameHere_PostCSWreg.

B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No
2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):
 - a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
 - b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.
3. **Stormwater management limitations and exceptions:**
 - a. Limitations
 - 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No
 - a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
 - 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☐ Yes ☒ No
 - a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
 - 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow ☐ Yes ☒ No

exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process.

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:
- a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No
 - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
 - b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No
 - c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No
 - d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No
 - e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No
 - f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No
5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☐ Yes ☒ No
 - b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☐ Yes ☒ No
 - c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

B2-5: Amend the current post-construction ordinance, which only has some minor guidance related to green infrastructure techniques and practices (B2) and right to inspect (B5c); and does not cover the other tasks in B3 through B5. A majority of the development in the City is redevelopment. The City has hired a consultant to suggest amendments to the current ordinance that will meet the new requirements of the MS4 general permit. The consultant will be working with the city engineer and other city departments to coordinate the changes. The ordinance will be amended within 12 months of the date permit coverage is extended. For all ordinance updates, a draft will be completed within nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance. Applicable items will be addressed in a site planning checklist that the City will develop in conjunction with the ordinance.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)?

☐ Yes ☒ No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:

Some enforcement response procedures are already covered in several ordinances to include City Code Section 120 subd. 4.a., Zoning Ordinance 40.7(4) and 40.9(1). The City has hired a consultant to develop a written procedure that will satisfy these requirements. We have already met to discuss the requirements as part of updating the City's stormwater program to meet the new MS4 permit requirements. Any ordinance amendments and ERP's will be developed and implemented within 12 months of the date permit coverage is extended. For all ordinance updates, a draft will be completed nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance.

B. Describe your ERPs:

We do not currently have formalized ERPs, see above implementation plan. See below for our current working draft:

Examples of categories of violations the city may consider including in their plan:

- *Failure to apply for permit coverage*
- *Failure to prepare a Storm Water Pollution Prevention Plan (SWPPP)*
- *Inadequate SWPPP*
- *Failure to implement Best Management Practices (BMPs)*
- *Failure to maintain BMPs*
- *Failure to conduct or document inspections*
- *Non-stormwater discharge to the storm sewer system*

Examples of factors the City may consider in the selection of enforcement response:

- *Whether there is an isolated or infrequent violation*
- *Frequent or repeat violations*
- *Other types of noncompliance involved*
- *Degree of impact to the environment*

Examples of Enforcement Responses the City may consider including in their plan:

• *Notice of Violation (NOV) - A written document issued by Regulator (us) to a permittee or other regulatee informing them of the party's violation(s) of the applicable permit, statute or regulation*

• *Expedited Settlement Offer (ESO) - A consent agreement and final penalty order issued by us, in specified circumstances, where violations of the applicable permit, statute or regulation may be resolved quickly through an expedited process in which the violator:*

- ☐ *corrects identified deficiencies*
- ☐ *signs an agreement with us certifying that deficiencies have been corrected*
- ☐ *pays a penalty*

• *Administrative Order (AO) - A written document issued by us which contains findings of fact and which directs a permittee or other regulatee to achieve compliance with the applicable permit, statute or regulation*

• *Administrative Penalty Order (APO) - An order entered by us assessing penalties against a permittee or other regulatee for violating the applicable permit, statute or regulation*

• *A Civil Action - A judicial action that typically seeks both penalties and injunctive relief for violating the applicable permit, statute or regulation*

The are several codified enforcement responses that the City already utilizes, to include: stop work orders, not issuing certificates of occupancy until the deficiency is corrected, requiring financial security for storm water compliance prior to beginning the project and criminal judicial action as circumstances dictate.

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

The City works with Dakota County to prepare the system map and asset inventory using GIS. The City passes the collected data to the Dakota County GIS technician for inclusion in the City's map layers and data attributes.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☒ Yes ☐ No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☐ Yes ☒ No
3. Structural stormwater BMPs that are part of the permittee's small MS4. ☐ Yes ☒ No
4. All receiving waters. ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The map must be reviewed and updated to ensure that all structural BMPs have been identified and that each has a unique identifier and geographic coordinates. The City will work with Dakota County to create a list of unique identifiers and geographic coordinates for each outfall within the MS4. The City has hired a consultant to use the data to complete the required inventory.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☒ Yes ☐ No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☒ Yes ☐ No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. ☒ Yes ☐ No
2. A geographic coordinate. ☐ Yes ☒ No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☐ Yes ☒ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The City will work with Dakota County and the information will be gathered from the GIS system and unique identifiers assigned so that the inventory form can be completed by the City's consultant within 12 months of the date permit coverage is extended.

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4>, according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. ☐ Yes ☒ No

If you answered **no**, the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. **MCM1: Public education and outreach**

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

The City uses an array of public education efforts to address stormwater issues across a broad spectrum of citizens. Current methodologies include using the City's newsletter and brochures to reach large numbers of citizens. Educational

topics vary each year based upon needs identified by staff. The City also has a website. The City's SWPPP and SWMP are available on the website. The site also addresses development and has links to documents that outline the submittal requirements and permit applications. Friends of the Mississippi were used to develop a catch basin stenciling program. Stenciling materials and support are provided to groups interested in participating in the program. The City has also worked with Dakota County to educate residents on the benefits of rain gardens.

- List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Newsletter	Published four times per year, publish 3 articles per year related to storm water, available electronically and distributed via mail each quarter. Retain copies of the published articles.
Website	Measure number of hits. Update website to account for changes due to the new permit requirements in Year 2. Review the website annually.
Brochures	Brochures are distributed annually to all households in the utility bill. Brochures are available at city hall. Appropriate permit applicants are provided brochures with information on the permit application, construction site runoff control policies and post-construction runoff control. Update annually as new information becomes available.
Storm Drain Stenciling	Stencil at least 30 drains per year.
BMP categories to be implemented	Measurable goals and timeframes

- Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

City Engineer

B. MCM2: Public participation and involvement

- The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

The City conducts an annual meeting after a 30-day public notice period. The SWPPP document is posted on-line on the City's website year-round. Staff receives comments during the 30-day notice period and during the meeting. All comments are reviewed by staff and a formal response is prepared for the record. The SWPPP document is amended as deemed by the council. Records documenting the process are kept. The annual meeting is televised and replayed on CCTV for a period of about 12 months.

- List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Annual Storm Water Meeting	Hold an annual meeting and have access to annual meeting on CCTV and online.
Appropriate public notice	Publish meeting notice 30 days prior to the meeting in the local paper (Southwest Review) and City's website.
Availability of Storm Water Pollution Prevention Program Document	Provide a copy of the SWPPP on the City's website, library and city hall for viewing at any point in the year.

Public Comment	Written and oral comments will be accepted during the 30-day notice period and at the annual meeting. The City will review and formally respond to all comments and amend the SWPPP document as appropriate.
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BMP categories to be implemented	Measurable goals and timeframes
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3. Do you have a process for receiving and documenting citizen input? ☐ Yes ☒ No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

The City will develop documentation procedures that are in compliance with the new permit within twelve months of the date that permit coverage is extended. A draft copy of recommended procedures will be completed within six months of the date permit coverage is extended. City staff will review the procedures and make suggested changes to the city engineer during months six through nine. The city engineer will incorporate the changes into the procedures during the last three month period.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

City Engineer

C. MCM 3: Illicit discharge detection and elimination

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

Educational material that specifically addresses illicit discharge is published in the City's newsletter and on the City's website. Currently, the city has a CONTACT US button available on the Homepage of the website that residents can use to forward any issues that they would like staff to address. The City also has an email, Hotline and point of contact that can be used by citizens to report any type of code violation, including illicit discharge, on the Code Enforcement page of the website.

The City has all existing stormwater pipe, as well as ponds, lakes and streams within the MS4 mapped. The map is updated annually to include any new or redevelopment projects.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

- | | |
|---|---|
| a. Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.)Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| e. Procedures for the timely response to known, suspected, and reported illicit discharges. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| f. Procedures for investigating, locating, and eliminating the source of illicit discharges. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

C.2.a. The City currently has an illicit discharge ordinance, however the ordinance does not meet the new MS4 NPDES permit requirements. Any ordinance amendments and IDDE procedures will be developed and implemented within 12

months of the date permit coverage is extended. For all ordinance updates, a draft will be completed within nine months after the date permit coverage is extended to allow adequate time for the City's administrative process to promulgate an amended ordinance. The City has hired a consultant to help develop language that complies with the new MS4 permit.

C.2.b, d-g. The City is will develop an IDDE program that addresses each of these particular items to include identifying and tracking illicit discharges, identifying priority areas, eliminating illicit discharges, spill response procedures and updating the training program for the appropriate City personnel. Staff will begin outlining program needs in January 2014. Program needs will be identified within three months after permit coverage is extended. Over the next nine months, staff will work on developing and implementing the IDDE program. The program, including any supporting documentation for training, detection, identification, responding and eliminating illicit discharges and spill response procedures will be completed within the 12 month time period.

C.2.h The City is working with a consultant to develop ERPs to comply with the new MS4 permit. The consultant will prepare ERPs for MCMs 3, 4 & 5. A final draft will be presented to the City staff for review within nine months of the date permit coverage is extended.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Ordinance	Review the illicit discharge and public nuisance ordinances every general permit renewal to ensure that it continues to comply with the MS4 NPDES/SDS General Storm Water Permit. Update ordinance within 12 months permit coverage is extended.
Illicit Discharge Hotline	Hotline number is posted on the City's website and in the newsletter.
Spill Response and Reduction Program	Review the spill reduction and response plan annually in coordination with the City fire department and county.
Training	Train all new field employees in Parks Recreation and Public works, Community Development, Fire and Police for spotting and handling illicit discharges. Renew training every year.
Inspections	Inspect and document dry weather flow of 20% of all outlets on an annual basis.
Sanitary Sewer Overflow Program	Clean one-fourth (1/4 th) of sanitary sewer on an annual basis.
Structural BMPs	Number of ESC activities required during any construction activity. Number of additional BMPs required.
BMP categories to be implemented	Measurable goals and timeframes
Inspections	Quarterly inspections of high-priority outfalls, and around high-risk establishments (fast food restaurants, dumpsters, car washes, mechanics, oil changes).

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☐ Yes ☒ No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

The City Engineer's staff will work with the City's administrative staff, including IT, to develop an IDDE reporting form and electronic method for filing and storing IDDE records. Within three months after permit extension, staff will meet to discuss the most effective procedure to maintain the records. During the next six months staff will work concurrently on the forms and electronic storage solution. The record-keeping procedures will be tested and implemented during the next three month period to meet the 12 month deadline.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

City Engineer

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall

revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

Most construction in West Saint Paul is redevelopment. The City has developed a flow chart that outlines the process that developers and contractors need to follow for site plan review. The process is broken down into two parts: prior to the construction process and after development/planning process. A guideline is also available that indicates the permit submittal requirements for the project. All of this information is available on the City's website.

The City has a CONTACT US button available on the Homepage of the website that residents can use to forward any issues that they would like staff to address. The City also has an email, Hotline and point of contact that can be used by citizens to report any type of code violation, including construction site issues, on the Code Enforcement page of the website.

For construction, the City has established a list of six minimum BMPs for construction activity. The list is provided to developers and contractors. The City has implemented an inspection program for construction site activity and continues to evaluate its effectiveness.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
 - a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☒ Yes ☐ No
 - b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☒ Yes ☐ No
 - c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☒ Yes ☐ No
 - d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? ☐ Yes ☒ No
 - 2) Does your program identify a frequency at which you will conduct construction site inspections? ☐ Yes ☒ No
 - 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☐ Yes ☒ No
 - 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☐ Yes ☒ No
 - e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☒ Yes ☐ No
 - f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☒ Yes ☐ No
 - g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

2.d. The City will develop a construction site inspection program that meets the requirements of the new MS4 general permit. The Standard Operating Procedure will include items 2.d.(1), (2) & (3). A site inspection checklist will be developed during the process to meet the requirement of 2.d.(4).

2.g. In conjunction with item 4 in the IDDE section, staff will develop records retention procedures using the same timeline.

Staff will use the general timetable previously described in other MCMs. Staff will identify all permit requirements and steps needed to meet the requirements within three months after permit coverage is extended. Staff will use the next nine months to prepare and implement all required changes to the program to meet the new permit requirements. Engineering and Community Development staff will work together on the construction activity portion of the permit.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Structural BMPs	Annually review and publish a list of minimally required erosion

	and sediment control BMPs for construction activities.
Permit Application System	Process all applications within 2 weeks of receipt. Number of permits processed/approved.
Site Plan Review	Update procedures for site plan review on a biennial basis and incorporate into the checklist created in BMP categories to be implemented.
Owner Inspections	Conduct weekly inspections after every storm event that is large enough to result in runoff from the site by either the developer or the developer's designated representative.
Customer Complaint Hotline	This is the City's Code Enforcement Hotline and is posted on the City's website and annual in the City newsletter. Document/track complaints.
Training	Train all new field employees in Parks Recreation and Public Works, Community Development in new construction and land disturbance and storm water system management. Renew training every year for all other identified field employees.
BMP categories to be implemented	Measurable goals and timeframes
Inspections	Conduct inspections at all permitted sites annually. Inspections occur every month during the growing season.
Education	Develop a fact sheet to accompany training and permit application to assist contractors with understanding permit regulations. Make available on the website and give it to contractors when they apply for a permit. Number of hits. Number of fact sheets given to contractors.
Ordinance/Permit Update	Update our city permit and ordinance to meet MPCA General Permit to Discharge Storm Water Associated with Construction Activity.
Checklist for Site Plan Review	Update procedures for site plan review to meet new storm water permit requirements and incorporate into a checklist.
Prioritize Inspections	Ensure at least 20% of inspections conducted annually are performed at deemed high priority inspection sites (e.g., near sensitive receiving waters, projects larger than 5 acres)

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

City Engineer

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

Zoning Ordinance, Section 40 outlines current post-construction requirements for developers and contractors and it outlines post-construction permanent storm water controls, minimum design standards for water wet detention facilities and minimum protection for wetlands. It also outlines required inspection periods for post-construction activities.

Post-construction stormwater management is also covered in the City's site review process. The City has developed a flow chart that outlines the process that developers and contractors need to follow for site plan review. The process is broken down into two parts: prior to the construction process and after development/planning process. A guideline is also available that indicates the permit submittal requirements for the project. All of this information is available on the City's website.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☒ Yes ☐ No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☐ Yes ☒ No
 - All supporting documentation associated with mitigation projects that you authorize? ☐ Yes ☒ No
 - Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☐ Yes ☒ No
 - All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

The City Engineer's staff will work with the City's administrative staff, including Planning, Finance and IT, to develop a process and procedure to comply with the new permit requirements for post construction. During the first six months after permit coverage, staff will meet to develop a process and procedures for implementation. Staff will use that information to develop a process diagram, update the site plan checklist and write a standard operating procedure. It is expected to take six months to complete the second phase.

3.a. The City will update their site plan checklist. It will contain the information and will be filed with the permit application. The current zoning ordinance requires that all computations appear in the plans submitted for review.

3.b. The City will develop a process and written procedure to document any post-construction mitigation.

3.c. The City will develop a process and written procedure to document payments in lieu of on-site, post-construction, structural BMPs necessary for permit compliance.

3.d. The City will create draft language that will be included in all development contracts that have private stormwater structures. The City will use a consultant to modify its ordinance to include the requirements.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Site Plan Review	Update procedures for site plan review on a biennial basis and incorporate into the checklist created in BMP categories to be implemented.
Ordinance	Outline permanent storm water pollution controls, minimum design standards for detention facilities and minimum protection for wetland control and review during site plan review. Review and update when new general storm water permit is issued.
Municipal Water Resources Management Plan	Review and update when new general storm water permit is issued.
Inspections	Annual inspections of at least 20% of completed city-owned outlets, ponds and basins. Annual inspections of pollution control devices (other BMPs).
Training	Train all new field employees in Parks Recreation and Public works, Community Development in storm water system management. Renew training every year.

BMP categories to be implemented	Measurable goals and timeframes
Update ordinance to meet new permit requirements	Within 12 months of extension of permit coverage, revise ordinance to meet permit requirements.
Develop written procedures for site plan review	Within 12 months of extension of permit coverage, develop site plan review procedures that must be completed prior to the start of construction activity.
Document pertinent project information	Maintain all related documents pertaining to each new or redevelopment project in more user-friendly filing system for better records management. Implement within 12 months.
BMP Construction Guidance	Develop BMP Construction Guidance document for developers and contractors within 12 months of permit coverage extension.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

City Engineer

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

The City conducts inspections and maintenance of its stormwater system (outfalls, ponds, basins and control devices) on a regular basis. Maintenance activities are implemented within one year after discovery or to the MEP. The City's training program covers such activities as: parks and open space maintenance; fleet and building maintenance; new construction and land disturbances; and stormwater systems maintenance. Streets are swept twice each year, once in the spring and once in the fall to reduce the potential for large amounts of debris entering the stormwater system. For winter operations, staff evaluates their salt/sand operations annually and evaluates new deicing products as they become available.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☐ Yes ☒ No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

The Engineering Department will identify a staff member to direct and coordinate the inventory after permit coverage is extended. During the summer of 2014, the City will work with summer seasonal employee(s) to identify and create an inventory of City facilities that have the potential to contribute pollutants to stormwater discharges. The list of potential sites will be completed by October 2014 and subsequently reviewed by the project coordinator. After review, the inventory will be given to Dakota County to be added to the City's GIS database and map. The inventory and map will be completed within 12 months of the date permit coverage is extended.

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Training	Train all new field employees in Parks Recreation and Public works proper deicing operations, fertilizer and herbicide control, equipment maintenance and stock pile storage and handling. Renew training annually.
Street Sweeping	Sweep city streets at least twice per year.
Inspect City Stockpile Maintenance	Conduct annual inspections and identify improvements. Increase frequency to quarterly in 2015.
Record Keeping	Maintain all records three years beyond the term of the permit.
Pond Inspections	Number of inspections, inspection results and recommended actions. Inspect ponds biennially unless increased maintenance requirements dictate otherwise.
BMP categories to be implemented	Measurable goals and timeframes
Facility Inventory	Develop facility inventory within 12 months permit coverage is extended for City-owned properties and buildings. Consider other city-owned facilities to inventory in Year 2.
Pond Assessment Procedures & Schedule	In Year 1, develop procedures for determining TSS and TP treatment effectiveness of city-owned ponds used for treatment of storm water. Implement schedule in Years 2 – 5.
Develop Maintenance Yard Inspection Program	Utilize a checklist quarterly for the inspection that documents findings and allows staff to compare to previous inspections.
Update Spill Prevention & Control Plans for Municipal Facilities	Update plans describing spill prevention and control procedures by the end of Year 2. Conduct annual spill prevention and response training sessions for all municipal employees. Distribute educational materials, e.g., posters and pamphlets, to each municipal facility by the end of Year 3. Include in initial employee training. Report the number of employees and new employees trained.
Storm Water Inspection Program	Create an inspection plan and timetable in Year 1. Complete all inspections in accordance with the plan by the expiration of the

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☐ Yes ☒ No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☐ Yes ☐ No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☐ No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☐ No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☐ Yes ☒ No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? ☒ Yes ☐ No
- b. Covers the requirements of the permit relevant to the duties of the employee? ☒ Yes ☐ No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☐ Yes ☒ No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

F.6. The City is currently examining methods for assessing ponds to determine TSS and TP effectiveness, as we mentioned in our BMP table. This study will develop procedures for determining TSS and TP treatment effectiveness of city-owned ponds used for treatment of stormwater. A schedule will be implemented in year 2 – 5.

F.7. The City currently meets the pond temporal inspection requirements. An inspection plan and time table that meets the requirements of Part III.D.6.e (1)-(3) will be developed in year one and implemented in year two of the permit. All ponds, outfalls and BMP structures will be inspected by the expiration date of the permit.

F.8. Staff will work with HR to schedule initial stormwater training for all new employees and seasonal employees where appropriate. Program will be implemented within 12 months after permit coverage is extended.

F.9. The City has a documentation system for inspections, maintenance and training. However, the current system does not meet all of the requirements of the new permit. The system will be updated within the 12 months after permit coverage is extended to incorporate the new requirements.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

City Engineer

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☐ Yes ☒ No
1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following

naming convention: *MS4NameHere_TMDL*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No

1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.
This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program